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UNITED STATES DISTRICT COURT
 DISTRICT OF ARIZONA

Mi Familia Vota, et al.,

 Plaintiffs,

 v.

 Adrian Fontes, et al.,

 Defendants.

No. CV-22-00509-PHX-SRB (Lead)

**STIPULATION REGARDING
 ACCESS TO ADOT INFORMATION
 FOR EXPERT REVIEW**

(Before the Hon. Susan R. Bolton)

AND CONSOLIDATED CASES.

No. CV-22-00519-PHX-SRB
 No. CV-22-01003-PHX-SRB
 No. CV-22-01124-PHX-SRB
 No. CV-22-01369-PHX-SRB
 No. CV-22-01381-PHX-SRB
 No. CV-22-01602-PHX-SRB
 No. CV-22-01901-PHX-SRB

1 The Director of the Arizona Department of Transportation (“ADOT Director”) is a
2 party in this case as explained in a previous stipulation. (Doc. 381.) Consolidated Plaintiffs
3 have requested certain individualized data from ADOT’s Motor Vehicle Division (“MVD”)
4 for expert review. Because this data pertains to millions of Arizonans and raises potential
5 privacy concerns, Consolidated Plaintiffs and the ADOT Director stipulate as follows:

6 Subject to restrictions described below, the ADOT Director agrees to provide
7 Consolidated Plaintiffs’ expert or experts the following data for each active MVD record:

- 8 • MVD customer number
- 9 • AZ credential number
- 10 • Value in the NonCitizen field in the monthly extract provided to the Secretary of
11 State (Y or blank)
- 12 • Credential issuance date
- 13 • Credential expiration date

14 Consolidated Plaintiffs agree that such data will be treated as “Confidential – For
15 Counsel Only” under the Supplemental Protective Order (Doc. 457) and their expert or
16 experts will abide by the conditions of this designation. Consolidated Plaintiffs
17 acknowledge that the Driver Privacy Protection Act independently protects personal data,
18 which means unlawful disclosure may not only violate the Supplemental Protective Order
19 but also may result in civil and criminal liability. *See* A.R.S. § 28-457.

20 Consolidated Plaintiffs further agree as follows:

- 21 • Such data may not be transmitted except via secure file transfer.
- 22 • Such data may not be copied except as may be necessary for expert use in this
23 litigation.
- 24 • Such data may be viewed only by counsel of record and by retained experts for
25 whom the data is relevant to their expert analysis.
- 26 • Such data may not be viewed by more than 16 of Consolidated Plaintiffs’
27 attorneys (though substitutions are permissible if an attorney exits the case or is
28 absent or on leave for more than two weeks).

1 For clarification, these restrictions apply to the individualized data being provided,
2 not to an overall analysis performed by an expert based on the data.

3 This stipulation was negotiated between counsel for the ADOT Director and counsel
4 for Consolidated Plaintiffs. The ADOT Director would be willing to provide a defense
5 expert or experts the same data under the same restrictions.

6 DATED this 29th day of August, 2023.

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